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signature pages*

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR

Honorable Yvonne Gonzalez Rogers

**STIPULATION REGARDING SEALING
JOINT LETTER BRIEF REGARDING
META DEFENDANTS' RESPONSES TO
PLAINTIFFS' REQUESTS FOR
PRODUCTION Nos. 317, 325, 335, 344-
346, and 357**

Pursuant to Civil Local Rules 7-11 and 79-5 and the Court's Order Setting Sealing Procedures (MDL Dkt. 341), the PI/SD Plaintiffs and Defendants Meta Platforms, Inc. f/k/a Facebook, Inc.; Facebook Holdings, LLC; Facebook Operations, LLC; Facebook Payments, Inc.; Facebook Technologies, LLC; Instagram, LLC; and Siculus, Inc. (collectively, "Meta") submit this Stipulation Regarding Sealing Material in Joint Letter Brief on Personal Injury and School District Plaintiffs' Requests for Production Nos. 317, 325, 335, 344-346, and 357 as to Meta Defendants (ECF 1316 (redacted, public version); ECF 1317-1 (provisionally filed under seal)).

Meta provisionally and temporarily sealed several discrete pieces of information in the letter brief pursuant to ECF 341 because the documents from which that information is derived were designated as Confidential or Highly Confidential under the Protective Order and in light of the short timeline Meta had to evaluate the specific excerpts that Plaintiffs included in their draft of the brief. Now that Meta has been able to evaluate the excerpts, and recognizing the public's interest in access to court documents, Meta does not seek to seal the information in the letter brief. By agreeing to not seal this material, Meta does not waive, and expressly reserves, its rights to move to seal other material from, or derived from, the documents cited in the letter brief. The confidentiality or appropriateness of sealing material other than that in the letter brief is not currently at issue, and Meta does not waive any right with respect to that material.

The Parties therefore agree that the letter brief may be unsealed and attach an unsealed copy to this stipulation.

IT IS SO STIPULATED AND AGREED.

DATED: November 21, 2024

Respectfully submitted,

COVINGTON & BURLING LLP

/s/ Ashley M. Simonsen

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ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: November 21, 2024

By: /s/ Ashley M. Simonsen

Ashley M. Simonsen